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May 4, 2022

VIA ECF

Honorable Paul A. Engelmayer, U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: Dashiell v. The New York Times Company, Civ. No. 1:22-cv-001922-PAE

Dear Judge Engelmayer:

This firm represents Defendant, The New York Times Company ("Defendant"), in the above-referenced matter. In accordance with Your Honor's individual rules and practices, we write to respectfully request a twenty-one (21) day extension of Defendant's time to respond to Plaintiff's Complaint through and including May 27, 2022.

Defendant's current deadline to respond to Plaintiff's Complaint is May 6, 2022. This is Defendant's first request for extension of time to respond to Plaintiff's Complaint and is sought in good faith and not for purposes of delay. Defendant requires the additional time to further investigate and respond substantively to Plaintiff's detailed allegations in the Complaint.

Plaintiff's counsel consents to the requested extension. Additionally, no conferences are presently scheduled, and this extension does not affect any other scheduled dates or deadlines.

We thank Your Honor for the kind consideration of this request.

Respectfully submitted,

SEYFARTH SHAW LLP

/s/ Courtney Stieber

Courtney Stieber

Granted. SO ORDERED.



PAUL A. ENGELMAYER
United States District Judge

5/4/22